

Tom B. Bacon

From: Thomas B. Bacon [baconlaw@bellsouth.net]
Sent: Tuesday, March 25, 2008 8:16 AM
To: michael.leonard@mbtlaw.com
Subject: Disabled Patriots v. Town & Country

Dear Mr. Leonard,

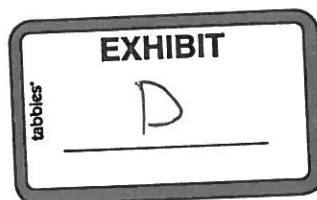
At the recent hearing, the Judge denied Plaintiffs' Motion To Compel as the basis for the dispute was Defendant's basic assertion that Rule 11 precluded Plaintiffs' entitlement to discovery. The Judge's additional order denying the Rule 11 Motion To Dismiss has mooted this objection. Therefore, kindly provide us with Defendant's outstanding discovery responses within ten days to avoid the filing of a second motion to compel.

Additionally, we would like to move forward with the Rule 34 inspection when we are in town on April 2, in the afternoon. This timely inspection is necessary if Defendant has any interest in an early resolution of the case. If Defendant agrees to submit to the inspection on April 2, Plaintiffs will agree to an extension on the remaining outstanding discovery of 30 days from the date when Plaintiffs submit a settlement proposal based on the R. 34 inspection report.

Kindly advise.

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